

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: § § CASE NO. 24-31596
MMA LAW FIRM, PLLC § §
Debtor § § CHAPTER 11
§

DEBTOR'S NOTICE OF 2004 DOCUMENT REQUEST TO KELLER POSTMAN LLC

Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, MMA Law Firm, PLLC (the “**Debtor**”), hereby requests that Keller Postman LLC produce the documents identified in **Exhibit A** attached hereto, on or before **September 10, 2025, at 5:00 PM Central Time**, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure.

All responsive documents shall be produced electronically and should be transmitted to the Debtor’s counsel:

Miriam T. Goott
Walker & Patterson, PC
Email: mgoott@walkerandpatterson.com

Dated: August 22, 2025.

Respectfully submitted,
/s/ Miriam T. Goott
Miriam T. Goott
TBN: 24048846
mgoott@walkerandpatterson.com
Walker & Patterson, PC
P.O. Box 61301
Houston, Texas 77208
Telephone: 713-956-5577
COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2025, a true and complete copy of the foregoing document was served by CM/ECF for the United States Bankruptcy Court for the Southern District of Texas to all parties registered to receive service and via email to Ashley Keller at ack@kellerpostman.com and via U.S. mail to Ashley Keller at 2333 Ponce de Leon Blvd, Suite R-240, Coral Gables, FL 33134.

/s/ Miriam T. Goott
Miriam T. Goott

EXHIBIT A - DOCUMENTS REQUESTED

DEFINITIONS

1. **“You” or “Your”** means Keller Postman LLC including any of its affiliates, partners, principals, predecessors, successors in interest, employees, agents, and representatives.
2. **“Cases” or “Case”** means any legal action, lawsuit, arbitration, or claim for which You and the Debtor entered into a written agreement relating to legal representation, fee sharing, or co-counseling, whether the case is currently pending, resolved, or closed.
3. **“Client” or “Clients”** refers to any individual or entity represented in a Case as defined above.
4. **“Debtor” or “MMA”** means MMA Law Firm, PLLC, the debtor in bankruptcy in case number 24-31596, pending before the United States Bankruptcy Court for the Southern District of Texas and formerly known as McClenney Moseley and Associates and includes predecessor entities of the Debtor.
5. **“Document”** has the broadest possible definition and means any form of recorded information, whether physical or electronic, in any media whatsoever. For the avoidance of doubt and by way of illustration, it would include not only signed written agreements, correspondence, and notes, but also emails, voicemails, text messages, ledgers, accounting records, electronic case management records, and client files.
6. **“Related to”** means directly or indirectly referring to, reflecting, concerning, arising from, connected with, pertaining to, evidencing, describing, or in any way logically or factually associated with the subject matter identified.

REQUEST FOR PRODUCTION NO. 1:

Produce a master list of all Cases, including the following information for each:

- a) Full client name
- b) Client contact information
- c) Case type (e.g. specific mass tort type)
- d) Case number (if applicable).

REQUEST FOR PRODUCTION NO. 2:

Produce all documents that describe or summarize the current status of each Case, including docket sheets, status summaries, client communications, third-party correspondence, or internal case tracking reports.

REQUEST FOR PRODUCTION NO. 3:

Produce all documents that identify where each of the Cases were filed (e.g. MDL, State Court, etc.)

REQUEST FOR PRODUCTION NO. 4:

Produce all documents indicating whether a medical diagnosis has been made for each Client.

REQUEST FOR PRODUCTION NO. 5:

Produce all documents including but not limited to a sworn affidavit by the Client showing evidence of exposure to or use of the product or substance involved in the claim asserted in each Case.

REQUEST FOR PRODUCTION NO. 6:

Produce all documents reflecting the estimated or actual value of each Case, including but not limited to settlement matrices, case tiering, internal valuation memos, correspondence regarding value, and settlement or award notices.

REQUEST FOR PRODUCTION NO. 7:

For all Cases You contend are closed or no longer being pursued, produce the following:

- a) Dismissal orders or final judgments
- b) Client-signed release forms
- c) Attorney closing memoranda or file closure notices

- d) Client communications advising that the case is no longer being pursued
- e) Proof of disbursement of funds to Clients (if applicable)

REQUEST FOR PRODUCTION NO. 8:

Produce all correspondence (written, email, or text) between You and the Clients related to the handling or resolution of their Cases, including updates, document requests, settlement offers, case closures, or consent to settle.

REQUEST FOR PRODUCTION NO. 9:

Produce all correspondence with third parties (e.g., including but not limited to co-counsel, settlement programs, claims administrators, medical providers, insurers) related to any Case, including documents discussing settlement, value, damages, or resolution.

REQUEST FOR PRODUCTION NO. 10:

Produce all ledgers, accounting statements, and financial records reflecting expenses, fees, disbursements, or expected recoveries for any Case.

REQUEST FOR PRODUCTION NO. 11:

Produce all communications with any third party regarding the potential sale, assignment, transfer, or valuation of **Your interest** in any of the Cases.

REQUEST FOR PRODUCTION NO. 12:

Produce all communications with any third party regarding the potential sale, assignment, transfer, or valuation of the **Debtor's interest** in any of the Cases.